

**Before the
Federal Communications Commission
Washington, DC 20554**

In the Matter of

Revision of Parts 2 and 15 of the
Commission's Rules to Permit Unlicensed
National Information Infrastructure (U-NII)
Devices in the 5 GHz band

ET Docket No. 03-122
RM - 10371

Comments Of Advanced Micro Devices, Inc.

Advanced Micro Devices (AMD) enthusiastically supports the addition of 255 MHz of internationally harmonized spectrum for digital wideband (as opposed to narrowband) communications as quickly as possible.

AMD supports the use of Dynamic Frequency Selection (DFS), with radar detection, as an acceptable method to protect incumbent users however AMD feels DFS should only be required to be implemented in central controller devices and not by the client devices controlled by the central controller devices. AMD suggests that the definition of DFS should be modified to state that uniform spreading should be required only over the available channels.

For devices that transmit with a power level that is 3 dB lower than the maximum allowed power level AMD feels Transmit Power Control (TPC) should not be mandated. In general AMD feels the FCC should allow manufacturers flexibility in complying with the TPC requirements.

With respect to the existing U-NII 5250-5350 MHz band, AMD suggests that a transition period for compliance to the new rules be tied to the availability of acceptable conformance testing procedures.

Respectfully submitted,

ADVANCED MICRO DEVICES, INC.

By: submitted electronically

Garth D. Hillman
Manager, Advanced Product Definition
Personal Connectivity Solutions
Advanced Micro Devices, Inc
5204 East Ben White Blvd
Austin, Texas 78741

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